

TES

Site: Herculaneum
 ID# MD00626373
 Break: 1.0
 Other: 2-8-02



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
 P.O. Box 176 Jefferson City, MO 65102-0176

A717

February 8, 2002

Mr. Art Spratlin
 Director
 Air, RCRA and Toxics Division
 Environmental Protection Agency
 Region VII
 901 N. 5th Street
 Kansas City, KS 66101

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SUPERFUND RECORDS

Dear Mr. Spratlin:

In reviewing remediation activities at the Doe Run Herculanum site, we have examined the lead concentrations in those yards that had been replaced over a period of years. These initial screening results indicate the rates at which these yards have become recontaminated is a serious concern. As part of this preliminary investigation, we have also looked at the dry deposition rates predicted by the air quality model used to demonstrate attainment as part of the State Implementation Plan (SIP) submittal. While this model is not intended to provide definitive deposition estimates, the preliminary results indicate that even after the SIP emission controls are implemented the deposition rates may not be acceptable.

The Department of Natural Resources is asking for EPA's assistance in studying this issue. Deposition will likely be a significant concern as we look toward managing the risk from this facility in the future. It is important to the health and safety of Herculanum residents that lead deposition not create future problems, whether or not the facility is in compliance with the air emissions standard.

We understand the Environmental Protection Agency has begun resampling locations where soil has been remediated to determine if recontamination is occurring. This data will no doubt be valuable, but it may not be adequate to define deposition rates.

One concept we should explore is to establish soil test plots in various locations around Herculanum, specifically near some of the air monitoring locations, to develop a relationship between deposition rates and ambient air concentrations. Test plots could also be established in areas of maximum predicted deposition. In-situ analysis with the portable X-ray fluorescence unit might be used periodically to determine accumulated deposition if method sensitivity is adequate and repeatable.

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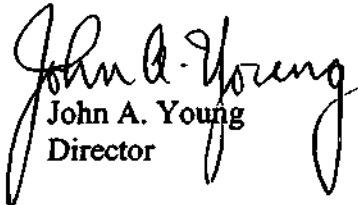
DIVISION

Mr. Art Spratlin
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This information will become critical as we continue to work through all issues associated with this facility and the impacts to the citizens. Please call me at (573) 751-0763, if you have any questions about this request. I want to sincerely thank you for your assistance with this difficult issue.

Sincerely,

AIR AND LAND PROTECTION DIVISION


John A. Young
Director

JAY:jrs